

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

No. 23-931 T
(Judge Ryan T. Holte)

PHILIP C. UELAND and NICOLE UELAND,

Plaintiffs,

v.

UNITED STATES,

Defendant.

JOINT MOTION TO STAY PROCEEDINGS

Pursuant to RCFC 7(b), the parties jointly move for an Order staying the proceedings in this case. Plaintiffs filed the Complaint in this case on June 20, 2023, and the Amended Complaint on June 23, 2023. (Dkt. 1, 6.) Plaintiffs are seeking a tax refund of \$95,850.10 for the 2017 tax year, plus statutory interest. Defendant's response to the Amended Complaint is currently due on Monday, August 21, 2023.

As reason for the request, the parties state that defendant's counsel is prepared to recommend that the case be administratively resolved by the Department of Justice, without need for the Court's intervention. The parties jointly propose a stay of the proceedings to allow defendant's counsel sufficient time to draft a memorandum analyzing the factual and legal issues in this case and recommending that an authorized delegate of the Attorney General of the United States approve the proposed resolution.

The parties respectfully request that the Court stay proceedings in this case. If the Court grants this motion, the parties propose to file a joint status report in 30 days advising the Court if the stay should remain in place, if the parties have not first dismissed the case.

Plaintiffs' counsel has authorized defendant's counsel to sign this motion on her behalf and to file it as a joint filing.

Respectfully submitted,

August 18, 2023

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